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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions.	Rulemaking 18-12-005 (Filed December 13, 2018)

WILLIAM B. ABRAMS OPENING COMMENTS

ON THE PHASE 3 STAFF PROPOSAL

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March 19, 2021

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William B. Abrams received party status via written ruling on January 24, 2019. In accordance with Rule 6.2 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, William B. Abrams submits these opening comments in response to the February 19, 2021 *"Assigned Commissioner's Phase 3 Scoping Memo and Ruling"* and the "*Proposed Additional and Modified De-Energization Guidelines in Addition to De-Energization Phase 2 Decision (D.20-06-051), Phase 1 Decision (D.19-05-042) and Resolution ESRB-8."* The due dates for the Opening and Reply Comments on the Phase 3 Staff Proposal were extended via email sent on March 2, 2021 by Administrative Law Judge Poirier.

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I. Introduction

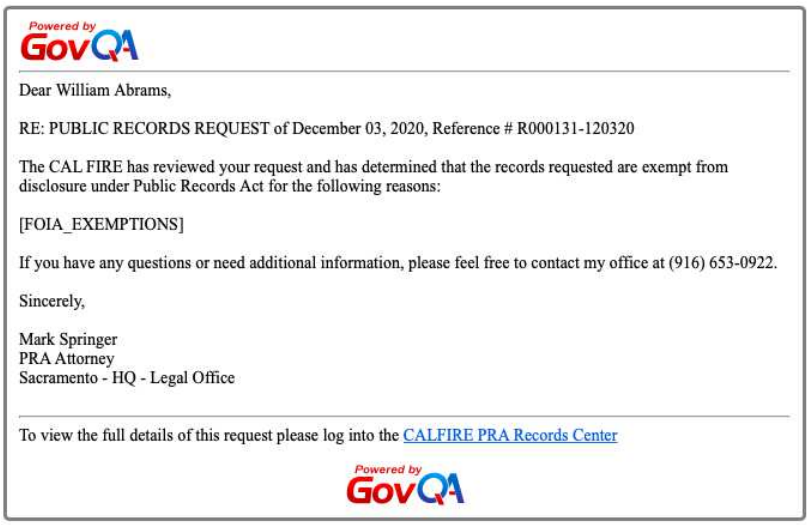
The Phase 3 Staff Proposal provides valuable context and identifies some important next steps to ensure our investor owned utilities (IOUs) consider more uniform standards in how they manage de-energization events. However, these guidelines are too broad to drive accountability and too general to drive the type of improvements we need to give our communities added safety, reliability and security during these events. As we know, these events cause significant adverse socio-economic impacts across our communities and effect the very fabric of our California culture. Moreover, the relationship between these de-energization events and the wildfires they are designed to mitigate remains largely unaddressed.

Added specificity regarding the de-energization guidelines will be helpful but it is really only through tying guidelines to measurable performance outcomes that we will be able to provide the type or reassurance we need for our businesses and residents across California. The fact that we are identifying these guidelines at the same time we are finalizing the 2021 IOU Wildfire Mitigation Plans (WMPs) provides added process problems given that de-energization tactics are often considered the mitigations of last resort and need to be incorporated into the WMPs after the guidelines are finalized. This "cart-before-the-horse" approach leaves the guidelines and the de-energization tactics that will result largely disconnected from the IOU WMPs which is not an insignificant issue.

II. Background

The mismanagement of the de-energization activities leading up to and contributing to the 2019 PG&E Kincade Fire is proof positive that when poor de-energization management is applied, cascading and catastrophic problems do occur for our communities. We should not define these guidelines without a careful consideration of these interrelated issues yet we proceed without the evidentiary record to inform our analysis. Due to concerns about the public safety implications of this path, I filed a motion to ensure the evidentiary record from the CAL Fire

Kincade report could be considered to inform these guidelines.[1] This motion was denied.[2] Myself and other parties also submitted public records requests to CAL Fire directly for this report. These repeated requests were denied:



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Dear William Abrams,

RE: PUBLIC RECORDS REQUEST of December 03, 2020, Reference # R000131-120320

The CAL FIRE has reviewed your request and has determined that the records requested are exempt from disclosure under Public Records Act for the following reasons:

[FOIA_EXEMPTIONS]

If you have any questions or need additional information, please feel free to contact my office at (916) 653-0922.

Sincerely,

Mark Springer
PRA Attorney
Sacramento - HQ - Legal Office

To view the full details of this request please log into the CALFIRE PRA Records Center

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Now, we are two years after the Kincade Fire and the report is still undisclosed. Yes, the commission and parties to this proceeding are left in the dark without the ability to make the necessary changes to these de-energization guidelines to ensure the same type of de-energization mismanagement does not lead to more catastrophic wildfires. This situation is unacceptable, untenable and yet very much avoidable. The report can and should be released. I urge the California Public Utilities Commission (CPUC), Governor Newsom and other state agencies to demand the release of this and other reports BEFORE these guidelines are finalized. This ongoing cycle of not releasing critical reports that could improve safety followed by more catastrophic wildfires needs to be a halted immediately. This vicious cycle prioritizes the tactical legal advantage of certain public and private parties over the commission's mission to promote "SAFE, clean and affordable utility service."

[1] SEE "*WILLIAM B. ABRAMS MOTION FOR EVIDENTIARY HEARINGS GIVEN THE NEW EVIDENCE AND IMPLICATIONS REFLECTED IN THE CAL FIRE KINCADE REPORT ATTRIBUTABLE TO THE PG&E 2019 PSPS EVENTS*", https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M349/K706/349706964.PDF, *Filed October 27, 2020*

[2] See "*EMAIL RULING DENYING MOTION FOR EVIDENTIARY HEARINGS",* Filed November 24, 2020

Consider that in 2017 the Tubbs Fire in Sonoma County and the Honey Fire in Butte County were settled to avoid PG&E liabilities. The evidentiary record for the Tubbs Fire was buried by certain parties in exchange for an undisclosed settlement amount and in that same year PG&E settled with Butte County for $1.5M for the Honey Fire to avoid probation implications. **If this evidence was incorporated into this proceeding and others might we have more effectively mitigated the impacts of the 2018 Camp Fire and the 2019 Kincade Fire? What future catastrophic wildfires might we more successfully mitigate if we demand to have the Kincade Fire report BEFORE setting these de-energization guidelines?**

This background is directly relevant to this proceeding and to the formation of these de-energization guidelines. The commission can no longer afford to let the legal tactics of a few parties get in the way of the safety and security of our communities. Now, reluctantly, respectfully and without the necessary evidentiary record to inform our recommendations, I will proceed to provide comments on the proposed phase 3 staff report:

III. Comments on the Phase 3 De-Energization Guidelines

A. Community Resource Centers (CRCs)

1. *I am not responding to this question at this time but may provide reply comments*
2. *Each electric investor-owned utility must coordinate in advance with local and tribal governments to (a) identify sites for CRCs, (b) the level of services that will be available at those centers, and (c) execute standing contracts in advance to ensure that CRCs can be opened quickly.*

I agree that increased coordination regarding the CRCs is critical but the type of coordination and the definition of roles and responsibilities need to be much more defined to ensure proper management and accountability within these centers. Currently, there is a diffusion of responsibility related to who and how these centers are managed. When centers are managed poorly the different public and IOU stakeholders at the CRCs point fingers and discuss how the other party was in-charge and/or to blame.

This cannot be remedied by simply identifying "level of services" and executing "standard contracts." These two items must be linked if they are to be effective. **Service Level Agreements (SLAs) must be defined to ensure the right accountability and so ratepayers know who owns what in terms of the CRCs.** SLAs are the overarching agreements that provide the appropriate framework and the detailed requirements including these levels of service. By definition these agreements layout the metrics by which the services will be measured as well as remedies and penalties should these service levels not be achieved. These agreements are common practice for the utilities when they contract with their vendors and should not be abandoned as a tool to ensure accountability when it comes to public safety. These Service Level Agreements should be required and provided to the commission, parties to the proceeding and the public.

3. *Each electric investor-owned utility must detail in its annual CRC plan how the CRCs will provide the services and supplies required to serve medical baseline and AFN populations as recommended by the respective local governments and health agencies.*

Identifying "how the CRCs will provide services and supplies" is a good start but what is needed for this is a specific customer engagement strategy incorporated into the Service Level Agreements and provided to the "respective local governments and health agencies." We must identify measurable levels of service for these activities beyond the typical measurements provided by the utilities which are simply counts of the services and supplies provided. We need to ensure the QUALITY of the services by identifying the quality attributes and the quality controls (tools and measures) that will ensure a high-level of service particularly for these populations that are disproportionately at risk during de-energization events.

4. *Subject to current public health and safety protocols, each electric investor-owned utility must implement only indoor CRCs when the air quality index (AQI) for that area is projected to be or is at or above 101, which is the threshold AQI considered unhealthy for sensitive groups.*

Simply using AQI as the only environmental benchmark for determining the suitability of indoor vs. outdoor is insufficient. The other factors which are common during these events coinciding with high wildfire threat levels include high heat and high wind. We should include these measures when determining whether indoor CRCs should be required. The National Weather Service defines an "Excessive Heat Warning" as having "a heat index of 105 °F or greater that will last for 2 hours or more" and I recommend that the commission also include this as a threshold.[3] Similarly, the National Weather Service defines a "high wind warning" when there are "sustained winds or 40 mph or higher for one hour or more OR wind gusts of 58 mph or higher for any duration."[4] These three measures (temperature, wind and air quality) could be used to set an interdependent threshold or be used as independent criteria for when CRCs should be required to move indoors. The commission should also consider the fact that our elderly populations are particularly vulnerable to these adverse conditions and are often overrepresented at these centers during peak usage times.[5]

5. *I am not responding to this question at this time but may provide reply comments*
6. *Each electric investor-owned utility must make all CRC-location information publicly available and easily accessible on its respective de-energization webpage at least 24 hours before de-energization.*

This 24-hour timeframe is insufficient notice regarding the location of these CRC locations. **These CRC locations should rarely change and both the outdoor and indoor alternatives should be communicated to resident ratepayers prior to wildfire season (March/April timeframe) so they can prepare and plan accordingly.** Waiting until the adverse conditions are heaped upon a community is the wrong time to be providing this information. Many residents will need to identify alternate means of transportation and rely upon the accessibility of these sites for their health, safety and general peace-of-mind. Primary and backup locations should be pre-identified if a utility in coordination with local agencies determines that is prudent for public safety. We have pre-defined evacuation routes and shelters

[3] See National Weather Service, Heat Watch vs. Heat Warning, https://www.weather.gov/safety/heat-ww
[4] See National Weather Service, Wind Warnings, Watches & Advisories, https://www.weather.gov/safety/wind-ww
[5] See Sacramento Bee, "It being 95 degrees in our house… what it's like at Placerville PG&E power shutoff center", October 26, 2020, https://www.sacbee.com/news/local/article245585740.html

for all sorts of disaster scenarios (exp. tornado shelters, hurricane/flood evacuation routes, etc.) and should do so with these IOU events.

B. Critical Facilities and Infrastructure

1. *Each electric investor-owned utility must create a webpage accessible from its de-energization main page that explains the requirements to qualify as a "critical facility" and links the reader to an explanation of the application process to add new critical facilities.*
2. *Each electric investor-owned utility must provide a critical facilities plan in its pre-season report.*

These guidelines do not demonstrate the transparency and completeness of information necessary to protect and care for "critical facilities and infrastructure." **Specifically, IOUs should be required to provide maps of "sectionalization devices" and a functional description of these devices.** In the 2018 and 2019 timeframe, the utilities and the commission have focused on the number of "reclosers" as indicative of the degree to which de-energization events might be limited for a particular utility or community. Now, our IOUs leverage the broad term "sectionalization devices" more often to describe and in many cases to inflate their progress on being able to manage and limit these events. The result of this definitional conflation is that public officials, emergency managers and others often use these terms interchangeably which leads to a significant gaps in understanding regarding our capabilities to manage these events.

The commission should require that these "pre-season reports" contain maps with the location of these devices and associated device descriptions. This would enable our local agencies to have the information necessary to provide recommendations regarding the use of these devices to limit the scale and scope of these events. As an example, emergency managers in collaboration with others might be able to advise on how our telecommunication infrastructure might be safeguarded so our communities have more options to stay connected during these events. Without this information, the public is kept in the dark and disconnected from the true capabilities of our utilities to guard against the significant public safety and financial implications of these events. If this information was shared transparently, it would also help

build public trust in the prudent use of these de-energization tactics. Moreover, this information will help us better understand the balance between the risks associated with de-energization and the wildfire risks they are designed to mitigate.

Similarly, the mapped location of wind sensors should also be supplied in these "pre-season reports." Recent investigations and associated reporting have revealed that poor utility decision-making regarding where not to de-energize was in part due to the misuse of wind data far from the impacted locations. This was particularly true with the recent 2020 Zogg Fire where an investigation revealed "*PG&E ran a complicated algorithm designed to gauge the risk of a wind-sparked wildfire starting in each grid square on its map without knowing the actual wind conditions in each square.*"[6] Of course, the fact that utilities work with incomplete and often times inconclusive data is not the point. It is the transparency of this information which must be part of these guidelines so that the public understands the limitations of this information and can help guide decision-making.

If Shasta County Emergency Managers and other public officials understood where PG&E was sampling this wind data, might they have advised against this application of the data given their local knowledge of their county conditions? Might this have led to different decisions and perhaps avoided the Zogg Fire ignition? If this wind sensor map was provided to Shasta County officials prior to the 2020 wildfire season, might they have advocated to ensure an additional inexpensive wind sensor was positioned closer to their location? **We must not let the lack of disclosure around the Zogg Fire investigation or other undisclosed reports limit our ability to improve these de-energization guidelines.** We need to push for the evidentiary record in these official reports AND until these reports are released to the public we need to work with the investigative reporting that provides us a strong indication of likely causes. This information must inform how we improve these de-energization guidelines or we may misfocus our attention away from the types of improvements that will really make a positive impact on how these events are managed.

[6] See ABC10, "Investigation: PG&E made shutoff decisions on junk science", February 2, 2021, https://www.abc10.com/article/news/investigations/investigation-pge-shutoff-decisions-zogg-fire/103-273163f6-c0f6-4404-b36b-9053b2980d3d

C. De-Energization Exercises

1. *The existing guideline requiring each electric investor-owned utility to plan de-energization simulation exercises is modified to require such plan to be included in the utility's pre-season report.*
2. *Each electric investor-owned utility must conduct de-energization simulation exercises no later than 60 days after the issuance of the Phase 3 final decision, then again at least annually by July 1 using the same channels of decision-making, knowledge transfer, implementation, and communication that would be used in the event of a de-energization.*

So, let me state unequivocally that I am in favor of exercise. **However, conducting exercises without goals and objectives and the identification of specific exercise outcomes doesn't necessarily leave us better prepared for de-energization activities.** What are the measures of success for these exercises? Are utilities too focused on the speed of de-energization and re-energization as a measure of success? Are the utility efforts to trade away in-person line inspections prior to re-energization for drone and helicopter inspections also trading away safety? What are the important public and employee safety measures that will be reported through these "pre-season reports" to inform thoughtful regulation? Do we need to wait for phase 23 de-energization guidelines before we set some benchmarks and performance metrics relative to these exercises? Perhaps, if we identified the goals of these exercises we might better understand the interrelated objectives and factors that lead to the successful management of de-energization events.

Now, in saying this I am sure that the utilities have some broad goals for these exercises and perhaps some very specific metrics. I am simply stating that we should require that these be incorporated and standardized within these reports. This will facilitate best-practice sharing across our IOUs and provide us with a solid foundation for more stringent and regulatable guidelines in future phases. I urge the commission to push for more specificity and the inclusion of these performance-based standards.

D. Definitions

The definitions described in this section are helpful but I recommend that the commission require definitions for de-energizations themselves. I appreciate that the commission has referred to these events within the guidelines broadly as "de-energization" and not the more euphemistic term "Public Safety Power Shutoff" (PSPS) nomenclature. However, we have seen from this past summer that there are many types of de-energization naming conventions that are used quite strategically for various public relations reasons. While some of that may be unavoidable, I suggest for the purposes of these guidelines that we define all the terms used for cutting the power so that we can ensure effective communications around these issues. As an example, it seems that one of the distinguishing factors between a "blackout" and a "rolling blackout" is the degree of control a utility has regarding when and how de-energization occurs. The later "rolling blackouts" is meant to impart that utilities have more control over the situation. However, the degree of control seems to be undefined or at least differently defined across utilities.

Additionally, defining these terms will help us understand if the guidelines are applicable to all types of de-energization or just some. Are the exercises referred to in Section C only applicable for PSPS events or do they also prepare us for rolling blackouts and unplanned outages? Do we need to establish different guidelines for the different types of de-energization? Which tactics and guidelines for PSPS events when standardized will apply broadly and serve to improve our overall de-energization strategy? The definition of terms around the various forms of de-energization events will help us address these types of questions.

E. Education and Outreach

I appreciate and support the commission's progress in this area. These guidelines move us beyond the quantity of communications as the sole measure of success and instead rightly focus on the quality or effectiveness of these communications. The commission should expect that with the Phase 4 guidelines, we will be able to identify more design and implementation standards based upon the reported results from these initial surveys. **The commission may want**

to incorporate focus groups as another measurement tool for these communications when more qualitative information is desired. The commission could consider standard formats across IOUs for surveys and focus groups in future phases of the guidelines if focus group results were incorporated into these initial "pre-season reports."

F. Emergency Operations Centers (EOCs), State Operations Center, Liaisons

I am not responding to this section at this time but may provide reply comments

G. Medical Baseline and Access and Functional Needs (AFN) Communities

These guidelines are built upon an "e for effort" approach and not based upon results. The commission should not concern itself with "identification efforts" which is mentioned throughout the description of these guidelines. **Every communications tactic and strategy should be built upon driving measurable results which is nowhere mentioned within this section of the guidelines.** Within Guideline E "Education and Outreach" there are after-event surveys and metrics that are required as an appropriate next step to get to regulatable performance-based standards for de-energization communications. **The communication measurements for medical baseline and AFN communities should be no less rigorous.** I believe Mr. Vesey, PG&E CEO expressed this view quite clearly a year ago stating:

A (Vesey): "the only arbiter of effectiveness of communications are those people who are supposed to be receiving the communications. I think that's the point you're getting. Effective communication is not just touching and getting a response that somebody's been communicated for. It's what has been communicated, was the message received, was it actionable. These are all very good points, and it's something that we have to really up our game in, because I will say that when I say there were failures in the way we executed the PSPS in the last fire season, it also comes down to coordination and communication with the parties outside of the company."[7]

Yes, the communication strategies will be different for these populations as they should be for all populations. Effective communications strategies and tactics are always modified

[7] Proceeding I.19-09-016 Hearing Transcript (vol. 3), February 27, 2020 (pgs. 440-443)

based upon the targeted communities and audiences and certainly these populations will need different accommodations. However, I would advise the commission not to be concerned about the types of partnerships the IOUs build or the mode of those communications. In many ways this should simplify the regulatory work. I suggest that the guidelines be built upon surveys, focus groups and other means to measure the effectiveness of communications. **Distinct surveys may be provided for specific medical baseline customer segments and AFN communities to measure the quality of de-energization communications.** As an example, we might set the standard that 95% of ratepayers that rely upon electric-powered wheelchairs must be aware of where to charge their wheelchair during a de-energization event and how to get there. At a minimum, we should require the IOUs to provide these survey results so that we can set these types of standards with the phase 4 guidelines.

Similar performance-based measures should be established to gauge the effectiveness of other guidelines articulated within this section. It is not enough to state "each electric investor-owned utility must launch a program to support resiliency for customers that rely on medical equipment to sustain life, by providing them free backup batteries…" **Instead we need to set quality targets for effective communications and effective operations for these critical programs.** As an example, we might set a standard that 98% of ratepayers that rely on medical equipment must be aware of the utility defined process to receive a free backup battery and that a minimum of 95% of these ratepayers that request the battery must receive it within 30 days. The "how" should be at the discretion of the utility and whether they manage this internally and/or through partners should not matter to the commission. **Only results.**

H. Mitigation

1. *Each electric investor-owned utility must evaluate the impact of de-energization on transmission; evaluate how to mitigate and prepare for those impacts; include this evaluation in its post-event report.*

This extremely low bar should not be set by the commission and it is too little and too late to begin this work. As I stated within Section 2, the Kincade Fire was almost 2 years ago and we need to make sure that those failures that produced the largest wildfire in Sonoma County

history NEVER happen again. Calling for utilities to "***evaluate*** *the impact of de-energization on transmission;* ***evaluate how*** *to mitigate and prepare for those impacts*" is nowhere close to the urgency that should be expressed and nowhere close to the standards that should be set now 2-years after the Kincade wildfire.

Please consider the following statement of Paul McGregor, Director EO Risk Management and Analytics from a recent CPUC workshop on February 22, 2021:

> *"As part of our wildfire mitigation plan and our model, there are a lot of Failure Modes Effects and Analysis (FMEA) that goes on and gets done. So, we are looking at components that we need to mitigate... Also, as you said with regards to the Kincade Fire… the particular piece of equipment that was suspected of being part of this was a jumper cable and that particular piece of analysis is NOT discussed in our Wildfire Mitigation Plan because our transmission wildfire risk model is currently in development... with regards to our planning models as far as transmission wildfire risk assessment, we are still building that process in there. So, we got a ways to go in that and is one of the things we are working on in 2021. Unfortunately, we are struggling with data on that... but we are making progress."*[8]

We can see from this statement that PG&E even 2-years after the Kincade Fire has not addressed the failures and their mismanagement of de-energization associated with this fire. **This statement should not lead us to provide loose guidelines for transmission infrastructure but should be an alarm bell that leads to substantial PG&E efforts to ensure transmission lines are incorporated within the risk models and within these de-energization guidelines.** How can we be 2-years out from this catastrophic wildfire without ingraining the learnings from these failures into our de-energization guidelines? The relationship between poor de-energization management and the cause of the fire is clear even from the following press release issued days after the wildfire:

[8] See 2021 Wildfire Mitigation Plan Updates Technical Workshop, (admin monitor mark 2:00) http://www.adminmonitor.com/ca/cpuc/workshop/20210222/

> *"Following PG&E's established PSPS protocols and procedures, transmission lines in these areas remained energized.* ***Those transmission lines were not deenergized because forecast weather conditions, particularly wind speeds, did not trigger the PSPS protocol."***[9]

If we ignore the clear connections between the reckless PG&E de-energization decisions and the associated mismanaged processes that contributed to this catastrophic wildfire, we are at significant risk of seeing similarly-caused catastrophic wildfires in the near future.

I. Notifications

J. Regional Working Groups

K. Reporting

I am not responding to these sections at this time but may provide reply comments

IV. Conclusion

I commend the commission for their continued focus on improving our de-energization guidelines and appreciate the opportunity to provide these opening comments. Respectfully, I urge the commission to press CAL Fire to release the Kincade Fire report before finalizing these guidelines so that we may incorporate that report into the evidentiary record for this proceeding. Allowing inter-agency bureaucracy to interfere with public safety and progress around these guidelines should not be acceptable to any parties. It certainly is not acceptable to me or my many Sonoma County neighbors that have had year-after-year of wildfires and de-energization evacuations. The last thing our residents and businesses need this summer as we relax our COVID restrictions is to have mismanaged power shutoffs that will inevitably lead to more business closures and painful consequences across our communities.

[9] PG&E Press Release, October 24, 2019 "Electrical Incident Report filed with CPUC in response to Kincade Fire", https://www.pge.com/en/about/newsroom/newsdetails/index.page?title=20191024_electric_incident_report_filed_with_cpuc_in_response_to_kincade_fire

Without this report and others like it in the hands of the commission and parties to these wildfire related proceedings, we are significantly impaired in our evaluation of these phase 3 guidelines. However, there are important improvements that still can be made to more specifically articulate drive towards desired outcomes. These improvements include the following:

- Establish Service Level Agreements for our Community Resource Centers that more specifically integrate service levels to provide a higher-level of accountability
- Incorporate interdependent thresholds (heat, wind and air quality) for determining when CRCs need to be moved indoors
- Establish specific goals and objectives for de-energization exercises and measure the associated outcomes
- Expand the definitions to incorporate the different types of de-energization and leverage these definitions to improve the specificity of the guidelines overall
- Incorporate Focus Groups as a standard tool to measure qualitative impacts of de-energization policies and practices
- Ensure added rigor and results-orientation for communications and services to medical baseline and AFN populations
- Prioritize the incorporation of transmission-level de-energization policies and procedures into these phase 3 guidelines
- Ensure that we identify and learn from the relationship between recent de-energization events and the wildfires they are designed to mitigate so we understand and account for these risk tradeoffs within the guidelines

These guidelines are critically important for managing these events given the significant state-wide economic, social and environmental impacts they produce. It is important to keep in mind that these events only mitigate wildfire risks and other risks when they are managed effectively by our utilities. Guidelines without specific objectives and quality-based standards will not produce the outcomes our communities so desperately need. I urge the commission to improve these guidelines based upon the feedback from myself and other parties before they are approved.

Respectfully submitted, Dated: March 19, 2021

/s/ William B. Abrams
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